

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE LOWER MANHATTAN DISASTER  
SITE LITIGATION

21 MC 102 (AKH)

DAVID VIVAR,

07-CV-05390 (AKH)

Plaintiff,

-against-

**NOTICE OF DEFENDANT VERIZON  
NEW YORK INC.'S ADOPTION OF  
ANSWER TO MASTER COMPLAINT**

VERIZON NEW YORK INC.,  
et al.

Defendants.

PLEASE TAKE NOTICE THAT Defendant Verizon New York Inc. (“Verizon”) hereby adopts as its Answer in the instant case its Answer to Plaintiffs’ Master Complaint which was filed and served on October 16, 2007 in the matter of In re World Trade Center Lower Manhattan Disaster Site Litigation, 21 MC 102 (AKH). In accordance with Case Management Order No. 4, the allegations of the instant Check-Off Complaint are deemed to be denied. Verizon also incorporates by reference all averments and denials of its Answer to Plaintiffs’ Master Complaint as though same were more fully set forth herein at length. Verizon further adopts the responses contained in any Amended Answer filed and served herein.

PLEASE TAKE FURTHER NOTICE that Verizon reserves the right to file and serve an amended answer and specifically reserves the right to interpose cross-claims and third-party claims.

WHEREFORE, Verizon demands judgment dismissing the above-captioned action as against Verizon, together with its cost and disbursements.

Dated: November 26, 2007

/s/ Eric F. Leon  
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